

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

INDYMAC BANK, F.S.B	)	
a Federal Savings Bank,	)	
	)	
Plaintiff,	)	07 C 6224
	)	
vs.	)	Honorable Judge Ronald A. Guzman
	)	
GANESAN VISVABHARATHY,	)	
an individual and HAWTHORNE	)	
ORLANDO CORPORATION, a Florida	)	
corporation	)	
	)	
Defendants.	)	

**MEMORANDUM IN SUPPORT OF MOTION FOR ENTRY OF JUDGMENT**

Plaintiff, INDYMAC BANK, F.S.B. ("Plaintiff"), by and through its attorneys, Gary I. Blackman and James G. Martignon, hereby files this Memorandum in Support of this Motion for Entry of Judgment against Defendant, HAWTHORNE ORLANDO CORPORATION ("Defendant"). In support thereof, Plaintiff states as follows:

On November 2, 2007, Plaintiff filed its Complaint for breach of guaranty.

On February 22, 2008, this Court entered a Minute Order of Default as to HAWTHORNE ORLANDO CORPORATION. A copy of the Minute Order of Default is attached hereto as Exhibit "A".

Plaintiff seeks judgment for damages in the amount of \$48,567,476.52 In support thereof, the Affidavits of Todd Camp, Plaintiff's Vice President, and an Order are attached as Exhibits "B" and "C".

WHEREFORE, Plaintiff, INDYMAC BANK, F.S.B., respectfully requests that a Judgment Order be entered against Defendant HAWTHORNE ORLANDO CORPORATION in the amount of \$48,567,476.52

Respectfully submitted,

**INDYMAC BANK, F.S.B.**

By: /s/ James G. Martignon  
One of Its Attorneys

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 25, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and I hereby certify that I have by Federal Express and by messenger delivery served the document to the following:

**Via Federal Express and Messenger  
Delivery**  
Hawthorne Orlando Corporation  
222 East Pearson, Suite 709  
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/s/ James G. Martignon  
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